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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JESE DAVID CARILLO CASILLAS
(2),

GABRIELA MENDOZA VASQUEZ
(7),

BRITTANY LEE ZARAGOZA (10),
SALVADOR GUDINO CHAVEZ (11),

EDGAR OMAR HERRERA FARIAS
(16),

ALFREDO MAGANA GARIBAY (18),
JUAN BRAVO ZAMBRANO (19),

MIGUEL REYES GARCIA (21), and
JOSE ADRIAN MENDOZA (23),

Defendants.

No. 4:15-CR-6049-EFS

United States' Motion for
Extension of Time to Provide CI
Disclosures and Grand Jury
Transcripts

Plaintiff, United States of America, by and through JOSEPH H.

HARRINGTON, United States Attorney for the Eastern District of Washington, and

United States' Motion for Extension of Time to Provide CI Disclosures and Grand
Jury Transcripts - 1

1 Stephanie Van Marter and Caitlin Baunsgard, Assistant United States Attorneys for
2 the Eastern District of Washington, submits this motion for extension of time to
3 provide CI disclosures and grand jury transcripts in the above captioned case.
4

5 The Court's September 14, 2017, Case Management Order sets a deadline for
6 the production of CI's identities, *Giglio* disclosure and willingness to be interviewed
7 disclosed to Defendants (if applicable) and grand jury transcripts on February 23,
8 2018 (ECF No. 532). A pretrial conference is scheduled for March 6, 2018 (ECF No.
9 532). The United States requests an extension of time regarding these disclosures and
10 requests the Court to hear argument and set new dates for production at the currently
11 scheduled pretrial conference.
12
13

14 Since the last Pre-Trial Conference, Defendant Jese Casillas has been appointed
15 new counsel. The United States anticipates that there will be a motion to continue
16 trial based upon this new appointment. The United States further anticipates some
17 Defendants, not all, will be joining in that motion to continue. As a result, the United
18 States' concern is the disclosure of the identities of multiple confidential sources and
19 cooperating defendants prematurely, which will raise significant safety concerns for
20 these individuals. This concern is highlighted due to the fact that if this case were to
21 be continued, it could be pushed out several months increasing these individuals
22 exposure for an extended period of time. The Court intended this deadline to be a
23 month prior to trial, not three months which could in fact occur if the disclosures are
24
25
26
27

1 provide as scheduled. Understanding there has not been a determination as to any
2 continuance, this is a circumstance where these witnesses' safety should be a
3 compelling reason to re-address this deadline given the new circumstances before the
4 Court.
5

6 Given this request for extension, the United States would again extend an
7 invitation to counsel to meet and discuss the cooperators who would offer testimony
8 against their client and answer questions, absent identity.
9

10 The United States respectfully submits that this disclosure deadline should be
11 addressed at the March 6th conference given the potential change in circumstances.
12

13 The assigned AUSA has also been significantly ill and would request an
14 extension of time as to this deadline even if this Court would not consider granting
15 this extension until March 6th. The United States would in the alternative ask until
16 February 2, 2018.
17

18 The United States has sent notice to all counsel regarding this request, but does
19 not have specific responses as to objections. However, the United States anticipates
20 there will be objections to this request given the recent pre-trial motion practice.
21

22 DATED February 22, 2018.

23 JOSEPH H. HARRINGTON
24 United States Attorney
25 *s/Stephanie Van Marter*

26 Stephanie Van Marter
27 Assistant United States Attorney

CERTIFICATION

I hereby certify that on February 22, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following, and/or I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participant(s):

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s/Stephanie Van Marter
Stephanie Van Marter
Assistant United States Attorney